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LETTER AND RESPONSE TO REGULATOR COMMENTS TO HUMAN HEALTH RISK
EVALUATION FOR CONSTRUCTION EQUIPMENT DEPARTMENT OPERABLE UNIT 7
(OU7) NCBC DAVISVILLE RI
11/6/2012
TETRA TECH



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PITT-11-12-002

November 6, 2012

Project No. 112G01813

Mr. Jeffrey Dale
Remedial Project Manager
Naval Facilities Engineering Command, Mid-Atlantic
4911 South Broad Street
Building 679, PNBC
Philadelphia, Pennsylvania 19112-1303

Reference: Contract No. N62470-08-D-1001
Contract Task Order (CTO) Number WE-01

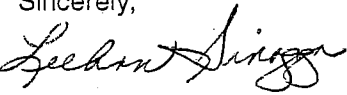
Subject: ***Revision 1 of the Human Health Risk Evaluation for the
Construction Equipment Department Soils at the
Former Naval Construction Battalion Center, Davisville
North Kingstown, Rhode Island***

Dear Mr. Dale:

Enclosed is Revision 1 of the *Human Health Risk Evaluation* of soils at the Construction Equipment Department (CED) at the Former Construction Battalion Center, Davisville, Rhode Island. Both hard and electronic (CD) versions are enclosed. Also enclosed is the response-to-comments (RTCs) document for comments received from the United States Environmental Protection Agency (USEPA) Region I and the State of Rhode Island Department of Environmental Management (RIDEM) on the draft version of the referenced report. The USEPA Region I comments were presented in correspondence dated September 8, 2011. The RIDEM comments were presented in correspondence dated September 29, 2011. The RTCs reflect, in part, the numerous BRAC Clean-up Team (BCT) discussions occurring over the past year regarding the CED area.

Please call me at 412-921-8608 if you have any questions regarding the enclosed documents.

Sincerely,


for Scott Anderson
Contract Task Order (CTO) Manager

SA/mlg
Enclosures (2)

cc: David Barney, BRAC Environmental Coordinator (1 copy, 1 CD)
Christine Williams, EPA Region I (4 copies, 4 CDs)
Richard Gottlieb, RIDEM (1 copy, 1 CD)
Bonnie Capito, NAVFAC (1 copy, 1 CD)
Andrew Glucksman, Mabbett and Associates (1 copy, 1 CD)
Steve King, QDC (1 copy, 1 CD)
John Reiner, Town of North Kingstown (1 copy, 1 CD)
John Trepanowski, Tetra Tech (1 copy, 1 CD)
Lee Ann Sinagoga, Tetra Tech (1 copy, 1 CD)
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ENCLOSURE 1

**Navy Response to United States Environmental Protection Agency (USEPA)
New England – Region I Comments on
The Human Health Risk Evaluation for Construction Equipment Department
Dated July 2011, OU7 at
The Former Naval Construction Battalion Center (NCBC) Davisville
Davisville, Rhode Island
(USEPA Region I Correspondence Dated September 8, 2011)**

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**Navy Response to United States Environmental Protection Agency (USEPA)
New England - Region I Comments on
The Human Health Risk Evaluation for Construction Equipment Department
Dated July 2011, OU7 at
The Former Naval Construction Battalion Center (NCBC) Davisville
Davisville, Rhode Island
(USEPA Region I Correspondence Dated September 8, 2011)**

General Comments

EPA Comment No. 1: The HHRE should provide better documentation for the statement that “detected soil concentrations are consistent with background” than the Shacklette and Boerngen study, which includes data from the entire Eastern U.S. This reference provides a good basis for looking at broad distributions of metals in surface soil, but it cannot be used to document background at a localized area. Background concentrations of metals are generally a function of soil type.

A suggested reference that provides Rhode Island specific data is “Background Levels of Priority Pollutant Metals in Rhode Island Soils”, which was developed by RIDEM and which is available at: <http://www.dem.ri.gov/programs/benviron/waste/pdf/metlbkgd.pdf>. This document used analytical data from 106 samples, and provides a map showing the geographic distribution of the samples. Arsenic was present in 76.4 percent of samples, with a higher percentage in samples collected in high density land use areas compared to low density land use area. In the report, RIDEM recommended using a 95% UCL on the geometric mean. The resulting values are compared to the Shacklette and Boerngen paper and are lower than the Eastern U.S. values. The RIDEM study includes values for other metals.

In addition, Navy should evaluate the cost effectiveness of a background study performed in accordance with EPA guidance. However, as noted in the document, while eliminating arsenic does not significantly change the risks evaluated in this HHRE, it still may need to be a part of the analytes monitored for future risk evaluations.

Navy Response to Comment No. 1: In addition to using the Eastern U.S. literature background values from the Shacklette and Boerngen study as a line of evidence, arsenic concentrations in soil were determined to be less than background by comparison with NCBC Davisville base background values (as presented on the surface and subsurface soil COPC selection tables). Additionally, the maximum concentration of arsenic in soil across all sites and study areas (6.8 mg/kg) is less than the State of Rhode Island background level for arsenic of 7 mg/kg, which is based on the 95% Upper Confidence Limit (UCL) when natural background data across the state are statistically evaluated (RIDEM, November 2011). In addition, all arsenic values detected in site/study area soils are less than 15 mg/kg, which is the maximum concentration individual arsenic samples can have to be considered consistent with state background levels (RIDEM, November 2011). The following information will be added to Section 4.4:

“Arsenic concentrations in site and study area soil are also less than the State of Rhode Island background value of 7 mg/kg (representing the 95% UCL of natural background data across the state) and less than 15 mg/kg, which is the concentration that no individual arsenic sample should exceed in order to be considered consistent with state background (RIDEM, November 2011). Arsenic

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concentrations in soil are also less than the NCBC Davisville facility background value."

In addition, the reference "RIDEM, November 2011" will be added to Footnote 4 of Executive Summary Table 2 and Footnote 4 in the in-text table of Section 4.5 to show that the State of Rhode Island literature background value was also used in determining that arsenic concentrations were within background levels.

EPA Comment No. 2: There is no Reference Section in the report. Please add.

Navy Response to Comment No. 2: *Agree. A reference section is included with the revised report.*

EPA Comment No. 3: Page ES-3, last sentence: Navy should briefly evaluate the cost of maintaining a use restriction versus a focused excavation to remove the small areas of soil contamination.

Navy Response to Comment No. 3: *Acknowledged. However, such an evaluation is beyond the scope of the current document and will be included in a focused feasibility study, as necessary.*

EPA Comment No. 4: Page 2-4, Section 2.2.3, Study Area Screening Evaluation: Please note in the first paragraph that the risks evaluated were only industrial/commercial. The risks to residential receptors were not evaluated in the Halliburton NUS, March 1995 document.

Navy Response to Comment No. 4: *Agree, this note will be added.*

EPA Comment No. 5: Page 4-3, Summary of Surface Soil COPCs Table and footnote; page 4-4, Summary of Subsurface Soil COPCs Table and footnote: We agree that a the decision to eliminate arsenic as a COPC for both surface and subsurface soils does not significantly change the risk estimates for this HHRE. Arsenic does not exceed the EPA RSL of 0.39 mg/kg but not the RIDEM criterion of 7 mg/kg, which is a soil background-based criterion. In the footnote for the Surface Soil table, the HHRE states that the arsenic concentrations "do not exceed" background concentrations reported for NCBC Davisville. In the footnote for the Subsurface Soil table, the HHRE states that the arsenic concentrations "do not appear to exceed" the background concentrations. The NCBC background concentrations are not referenced in the document, so it is not possible to review whether the arsenic concentrations do not exceed or appear to exceed them. However, the HHRE should provide additional justification for eliminating arsenic as a COPC and documentation of site-specific arsenic background concentrations if Navy decides to pursue a background study in accordance with current EPA guidance.

Navy Response to Comment No. 5: *The word "appear" will be deleted from the footnote for the Summary of Subsurface Soil COPCs table in Section 4.1.2. In addition, the NCBC Davisville background data will be appended to the document. Please see the response to General Comment 1 for the justification for eliminating arsenic as a COPC. Also, the Navy acknowledges that the available background soils data for NCBC Davisville is limited, and the evaluation predates current EPA and RIDEM guidance. However, given that the maximum detected arsenic concentration in soils is less than the State background criterion, risk management decisions regarding arsenic are not impacted by the lack of a more robust, comprehensive background dataset for arsenic.*

EPA Comment No. 6: Page 4-7, Section 4.1.3.1, Study Area 01: As noted in this section, 2 of 21 surface soil samples from Study Area 01 exceeded risk-based and EPA Maximum Contaminant level (MCL)-based SSLs at a DAF of 20. However, methylene chloride was not detected in Study Area 01 groundwater. As part of the rationale for eliminating methylene chloride as a COPC for groundwater protection, the HHRE states that "methylene chloride is a common laboratory contaminant" and that the

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concentrations detected in soil "may not be site related". Review of the Study Area 01 surface soil analytical data in Table B-1 indicates that there were no B-qualified data reported, indicating that methylene chloride was not detected in any of the blanks. Study Area 01 was used from drum storage, therefore it is possible that methylene chloride was present at the site.

Also in that same paragraph there is a discussion of PCE. Please note that MW 02-01S had PCE detected in 2007. This well is just south of SA01.

Navy Response to Comment No. 6: Methylene chloride was not retained as a chemical of concern (COC) for groundwater protection because it was not detected in shallow groundwater associated with Study Area 01. The following text in Section 4.1.3.1 and Section 4.1.3.3 for Study Area 01 will be deleted: "However, it should be noted that methylene chloride is a common laboratory contaminant and therefore the reported detections may not be site related."

Although PCE was detected in groundwater (including in well MW02-01S), PCE concentrations in groundwater were less than the current Maximum Contaminant Level (MCL). Therefore, PCE was not retained as a COC for groundwater protection.

EPA Comment No. 7: Page 4-16, Section 4.3, last paragraph: The HHRE should provide justification for not including the deeper soil, for example the type of construction foreseen for the site will not involve deep foundations due the expected implementation of ICs, etc. Proper management of soil should be considered for this OU since the risk is due to exposure to surface and subsurface soil is noted. This soil management IC could be similar to the one in place at the former AMTL NPL Site, Watertown, MA. See pages 17-21 of the following document:
<http://www.epa.gov/ictssw07/public/export/01/MA0213820939/262719.pdf>.

Navy Response to Comment No. 7: Subsurface soil data to a depth of 10 feet below ground surface (bgs) were quantitatively evaluated in the HHRA; given the anticipated future land use it is anticipated that most excavations would not exceed this depth. Only Sites 02 and 03 had subsurface soil data deeper than 10 feet bgs. These deep subsurface soil data are compared to screening criteria in the tables included in Section 3 of the report. As mentioned in Section 4.4, Page 4-25, "Contaminant concentrations in deep subsurface soil of Sites 02 and 03 do not significantly exceed concentrations in shallow subsurface soil (see Tables 3-25 and 3-28)." The following text will be added:

In Site 02 deep subsurface soil, only concentrations of arsenic exceed applicable screening criteria. The maximum concentration of arsenic detected in Site 02 deep subsurface soil (3.8 mg/kg) is not considerably different than the maximum concentrations of arsenic detected in shallower subsurface soil (3.5 mg/kg). The arsenic concentrations in deep subsurface soil do not exceed background concentrations. Therefore, no unacceptable risks are expected due to Site 02 deep subsurface soil.

In Site 03 deep subsurface soil, only concentrations of arsenic and manganese exceed applicable screening criteria. The maximum concentration of arsenic in Site 03 deep subsurface soil (2.7 mg/kg) is not considerably different from concentrations in the shallower Site 03 subsurface soil (2 mg/kg). The maximum concentration of arsenic is within background concentrations. The maximum manganese concentration in Site 03 deep subsurface soil (1330 mg/kg) is greater than the maximum manganese concentration in Site 03 shallow subsurface soil (110 mg/kg); however, the maximum concentration of manganese in deep Site 03 subsurface soil is still less than the RSL for residential soil (1800 mg/kg). Therefore, no unacceptable risks are anticipated due to chemical concentrations in Site 03 deep subsurface soil.

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EPA Comment No. 8: Pages 4-20 and 4-21, Section 4.4, Uncertainty Analysis: Please note a gasoline additive MMT (methylcyclopentadienyl manganese tricarbonyl), is a possible source of manganese in soils. MMT was used as a gasoline additive prior to 1976 as an additive to tetraethyl lead. Manganese leaches through soil and is often found in subsurface soil. On Page 4-21, there is additional discussion regarding background concentration of manganese that notes that the maximum concentration is 2,980 mg/kg in subsurface soil. The concentration in surface soil is lower, with a maximum of 337 mg/kg. This is consistent with the fate and transport of manganese. The maximum concentration in the subsurface soils is approximately one order of magnitude higher than the maximum in the surface soils, which leads to some concern about leaching.

Navy Response to Comment No. 8: *The data does not support the hypothesis of a large scale release of gasoline with the additive MMT, or that manganese has impacted groundwater quality.*

The maximum concentration of manganese in subsurface soil (2,980 mg/kg) was detected in sample B-02-08-04-S-4-6-D from Site 02 shallow subsurface soil. The maximum subsurface concentration was detected in a duplicate sample; the associated original sample only had a manganese concentration of 316 mg/kg. The second greatest concentration of manganese in the Site 02 subsurface soil data set is 1520 mg/kg, detected in duplicate sample B-02-10-08-S-8-10-D. The original sample associated with this duplicate has a concentration of only 167 mg/kg. Some uncertainty is associated with these results due to the elevated (i.e., greater than 50%) relative percent difference between original and duplicate sample results. Manganese subsurface soil results other than the maximum concentration detected in B-02-08-04-S-4-6-D are less than the residential soil RSL. All manganese subsurface soil concentrations are within one order of magnitude of surface soil concentrations for Site 02.

Although concentrations of manganese in surface and subsurface soil exceed the USEPA soil screening level (SSL) for groundwater protection, six of nine available groundwater samples (maximum manganese concentration is 1010 ug/L) had a manganese concentration exceeding the USEPA RSL for tap water (320 ug/L). The maximum concentration of manganese in groundwater was detected in well MW-Z3-03 in a sample collected in February 1996. Samples collected from well MW-Z3-03 in December 1996, March 1998, and September 2000 exceed the tap water RSL (concentrations range from 618 ug/L to 740 ug/L in these three samples). Concentrations of manganese detected in MW01-13S and MW01-14S also exceed the tap water RSL. However, all detected manganese concentrations in groundwater are within the range of NCBC Davisville background concentrations (15.8 ug/L to 3,250 ug/L).

Editorial Comments

EPA Comment No. 9: Page 2-5, Section 2.2.2.5.1, Site 02: first sentence, the "s" seems to be out of place, could the Navy mean "03"?

Navy Response to Comment No. 9: *The sentence should read, "Surface soil samples and subsurface soil samples were collected from Site 02, and groundwater samples were collected from shallow wells and deep wells." This revision will be made.*

EPA Comment No. 10: Section 3.1: On page 3 in the last sentence of the first partial paragraph, please change the word "waster" to "water".

Navy Response to Comment No.10: *Agree. This change will be made.*

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EPA Comment No. 11: Page 3-7, Section 3.2, Summary and Conclusions: The second full sentence on page 3-7 is missing a word. The word "**exceeding**" should be inserted between "concentrations" and "screening criteria".

Navy Response to Comment No. 11: *Agree. This change will be made.*

EPA Comment No. 12: Section 4.1.3: There is a reference "(May, 1996)" at the end of the first subsection entitled "Rationale". Please revise to include the author.

Navy Response to Comment No. 12: *Agree. This reference will be changed to "EPA, May 1996."*

EPA Comment No. 13: Page 4-2, Section 4.1.1: The section heading refers to "the HHRA", but it should be "**the HHRE**". The table of contents should be updated accordingly.

Navy Response to Comment No. 13: *The section heading will be changed to "the HHRE." No revisions to the table of contents are necessary on this basis.*

EPA Comment No. 14: Page 4-8, Section 4.1.3.1, Study Area 01: The last sentence in the first paragraph on Page 4-8 should read "May not be suitable for public or private **water** use..."

Navy Response to Comment No. 14: *Agree. This change will be made.*

ENCLOSURE 2

**Navy Response to Rhode Island Department of Environmental Management
Comments on the Draft Human Health Risk Evaluation
Sites 1, 2, 3, and 4 (Construction Equipment Department)
Davisville, Rhode Island
Submitted August 3, 2011, Dated July 29, 2011
(RIDEM Correspondence Dated September 29, 2011)**

**NAVY RESPONSE TO
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (RIDEM)
COMMENTS ON THE DRAFT HUMAN HEALTH RISK EVALUATION
SITES 1, 2, 3, and 4 (CONSTRUCTION EQUIPMENT DEPARTMENT)
DAVISVILLE, RHODE ISLAND
SUBMITTED AUGUST 3, 2011, DATED JULY 29, 2011
(RIDEM CORRESPONDENCE DATED SEPTEMBER 29, 2011)**

RIDEM Comments

RIDEM Comment No. 1: Page ES-2, Bullet 2 – This paragraph notes that arsenic would be considered a COPC; however, concentrations are within background values found in literature and within the range of NCBC background values. Unless it can be shown that arsenic meets the requirements of Section 12 of the RIDEM Remediation Regulations then arsenic must be considered a COPC. The NCBC background study that was done during the 1990's does not meet the requirements of Section 8.06 of the RIDEM Remediation Regulations and therefore, RIDEM no longer accepts it. While background values from literature are useful pieces of information, Sections 3.05 and 8.06 of the RIDEM Remediation Regulations, in combination, require a site specific background study. Please revise this document to reflect this information.

Navy Response to Comment No. 1: Arsenic concentrations are within NCBC background values; therefore, arsenic was not selected as a COPC. However, because there is not agreement with the basewide background data set, the concentrations of arsenic in soil were also compared to the RIDEM background value for arsenic presented in the RIDEM Remediation Regulations. Section 12 of the RIDEM Remediation Regulations includes the requirements that no individual arsenic sample result is greater than 15 parts per million (ppm), that no greater than 10% of sample results exceed 7.0 ppm, and that the average of all sample results is 7.0 ppm or less. The maximum concentration of arsenic in soil across all sites/study areas is 6.8 mg/kg (detected in Study Area 04 surface soil). Therefore, no soil sample results exceed 7.0 ppm, and the above requirements are met. The following information will be added as the second sentence in Footnote 1 of both the Summary of Surface Soil COPCs and Summary of Subsurface Soil COPCs tables in Section 4.1.2: "Additionally, all arsenic concentrations were less than the RIDEM Method 1 Direct Exposure Criterion for arsenic of 7.0 mg/kg, which is based on the 95 percent upper confidence limit of natural background across the state (RIDEM, November 2011)." The third sentence of Bullet 2 on Page ES-2 will be revised as, "Arsenic would also be considered a risk driver if evaluated as a COPC. However, arsenic concentrations in surface soil are within the range of literature background concentrations and within the range of NCBC Davisville background values. Additionally, arsenic concentrations in surface soil are less than the RIDEM direct exposure criterion, which is based on the 95 percent UCL of state-wide natural background data."

RIDEM Comment No. 2: Page 3-6, Section 3.1.1, Metals, Paragraph 1 - The RIDEM Remediation Regulations Industrial/Commercial Direct Exposure Criteria (I/CDEC) for lead is 500 mg/kg. It is noted that at Site 02 the maximum lead concentration in soil is 635 mg/kg (02-SS6). In addition, at locations 02-SS22 and 02-SS7 the lead concentrations are 537 and 601 mg/kg, respectively. At Site 03 the maximum lead concentration is 628 mg/kg at location 03-01-S-0-2. These lead concentrations exceed the I/CDEC and are in surface soil where the greatest chance of exposure exists.

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It is not clear what parameters were used to generate the risk analysis. Therefore, RIDEM defers to its Method 1 Direct Exposure Criteria. Please provide a map which delineates the sampling location 03-01-S-0-2 as it could not be found on Figure 3-4.

For Site 02 the lead may no longer be an issue as Building 224 was demolished resulting in the movement of soil. The three exceedances, noted above, are within 30' of each other extending from inside the former Building 224 to just outside the building. The Navy may want to consider re-sampling in the affected areas to ascertain whether lead is still a concern. Site 03 will also need to be addressed.

Navy Response to Comment No. 2: *The referenced Site 03 surface soil at location S-03-01-00-S in sample S-03-01-00-S-0-2 appears on Figure 3-4. Section 3.1.1 only discusses the nature and extent of metals concentrations detected, whereas Section 4.3 presents the evaluation of lead. Lead was evaluated using arithmetic mean lead concentrations as the exposure point concentrations, in accordance with USEPA guidance (USEPA, 1994, 2003, and 2009 – see references below). As discussed on Section 4.3, all arithmetic mean lead concentrations for all sites/study areas were less than both the RIDEM and Office of Solid Waste and Emergency Response (OSWER) criteria of 150 mg/kg and 400 mg/kg, respectively. Therefore, lead concentrations in Study Area 01, Site 02, and Site 03, and Study Area 04 soil did not pose adverse risk and were not further evaluated.*

USEPA (U.S. Environmental Protection Agency), 1994. Revised Interim Soil-Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities. Office of Solid Waste and Emergency Response, Washington, D.C. Directive 9355.4-12, July.

USEPA, 2003. Recommendations of the Technical Review Workgroup for Lead for an Approach to Assessing Risks Associated with Adult Exposures to Lead in Soil. Washington, D.C. EPA-540-R-03-001. January. [URL: <http://www.epa.gov/superfund/programs/lead/adult.htm>].

USEPA, 2010. Integrated Exposure Uptake Biokinetic Model for Lead in Children, Windows® version (IEUBKwin v 1.1 Build 11). February.

RIDEM Comment No. 3: Page 3-6, Section 3.1.1, Total Petroleum Hydrocarbons, Paragraph 1 – Similar to above, TPH exceeded the I/CDEC of 2,500 mg/kg at locations 02-SS17 (2,700 mg/kg) and SS3C-1-0-2 (3,100 mg/kg). In addition, these values exceed the GB Leachability Criteria. Site 03 needs to be investigated further as this was the only TPH sample taken and therefore the extent of contamination has not been determined.

Navy Response to Comment No. 3: *Based on the corrected database for Site 02, the maximum detected TPH concentration does not exceed 2,500 mg/kg (the RIDEM IC/DEC and GB leachability criteria). The maximum TPH concentration reported for soils at Site 03 does exceed 2,500 mg/kg. The Navy agrees that the TPH contamination in the soils at Site 03 does warrant further investigation. Please see the associated corrected report text and tables.*

RIDEM Comment No. 4: Table 4-11, Construction Worker, Subsurface Soil, Site 02 – Please explain why lead was not considered as part of the risk calculation since it was a major contaminant of concern due to the battery acid disposal. The concern is for the construction worker.

Navy Response to Comment No. 4: *As detailed in the text of Section 4, lead was not evaluated using the risk-ratio methodology presented in the referenced risk characterization tables (e.g., Table 4-11). Please see the text at the bottom of page 4-20 for an explanation of the risk*

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assessment methodology used to evaluate the lead concentrations detected in the CED area soils.

RIDEM Comment No. 5: Page 4-20, Bullet 3 – This section notes that lead was selected as a COPC for groundwater protection only. Please be advised that lead exceeds the RIDEM I/CDEC for soil and needs to be addressed on that basis as well.

Navy Response to Comment No. 5: *Lead was selected as a COPC for both groundwater protection and direct contact; however, lead was not selected as a risk driver for direct contact or a potential groundwater protection COC in the current evaluation. The referenced bullet discussing lead in Section 4.4 will be revised as follows: "The maximum concentrations of lead in surface and subsurface soil exceed the upper limit of the background range. The mean concentrations of lead in several surface soil and subsurface soil data sets are also greater than the literature mean concentration. Lead concentrations in Study Area 01 surface soil, Site 02 surface soil, Study Area 01 subsurface soil, Site 03 subsurface soil, and Study Area 04 subsurface soil are within the background range. Lead was not selected as a potential groundwater protection COC. A qualitative evaluation determined that mean lead concentrations were less than applicable direct-contact human health criteria at all sites/study areas (Section 4.3); therefore, lead was not a risk driver." Please see response to Comment 2.*

RIDEM Comment No. 6: General Comment – Please provide the input parameters for the risk assessment for all the categories evaluated (industrial worker, construction worker, trespasser, recreational, residential, etc.). These parameters would include, but not be limited to, averaging time, soil ingestion rate, exposure frequency, exposure duration, ingestion rate of water, body weight of child and adult, etc.

Navy Response to Comment No. 6: *Agree. A summary table of exposure assumptions used for the receptors evaluated is included in Section 4 of the report.*